

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF ALABAMA
SOUTHERN DIVISION**

NATALIE ALTINER,)
)
)
Plaintiff,)
)
)
v.)
)
)
FEDEX GROUND PACKAGES)
SYSTEMS, INC.,)
)
)
Defendant.)
)
)
)
)
)

1:08-cv-00034-WHA-CSC

**CONSENT MOTION FOR EXTENSION
OF TIME TO RESPOND TO COMPLAINT**

FedEx Ground Package System, Inc. (“FedEx Ground”), which was incorrectly named as the defendant in the above-captioned matter as FedEx Ground Packages Systems, Inc., hereby moves for an additional thirty (30) calendar days in which to respond to the Complaint in this action. In support of this motion, FedEx Ground states as follows:

1. On or about January 16, 2008, FedEx Ground appears to have been served with the Complaint in this action, and the responsive pleading in this action is currently due on Tuesday, February 5, 2008.
2. FedEx Ground requires additional time to prepare an answer or other appropriate response to the Complaint.
3. Counsel for the Plaintiff has authorized the undersigned counsel to represent in this motion that the Plaintiff does not oppose this extension request.

4. FedEx files this motion with the full reservation of all its rights and defenses, including, but not limited to, its rights to respond in all ways and raise all defenses contemplated under Federal Rule of Civil Procedure 12.

WHEREFORE, FedEx respectfully requests that this Court extend its time for responding to the Complaint until Thursday, March 6, 2008.

DATED this 31st day of January 2008.



Kenneth D. Sansom (SAN 047)
One of the Attorneys for the Defendant

Robert K. Spotswood (SPO 001)
Kenneth D. Sansom (SAN 047)
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Of Counsel to the Defendant

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CERTIFICATE OF SERVICE

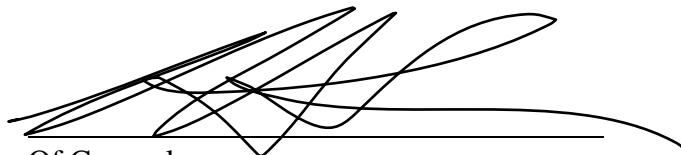
The undersigned declares as follows:

I hereby certify that on this date I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system, which will send notice to the following persons:

Jon C. Goldfarb
Ethan Detling
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I declare under penalty of perjury under the laws of the State of Alabama that the foregoing is true and correct.

DATED this 31st day of January 2008, at Birmingham, Alabama.



Of Counsel

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